



April 9, 2008

To the Secretary,
Federal Communications Commission:

On behalf of the Oklahoma Educational Television Authority (OETA) we ask for the Commission to reconsider some of the rules as spelled out in the FCC 07-205 Report and Order.

As a statewide, non-commercial television network, OETA fully supports the positions taken by the Association of Public Television Stations (APTS) and the Public Broadcasting Service (PBS) in their recently filed Joint Petition, and urge the Commission to reconsider the new rules as suggested.

OETA has no problem in meeting and surpassing the requirements for creating and broadcasting television programs that address local Problems and Programs. We also maintain a comprehensive quarterly listing of Problems and Programs in our public file. However, these new rules proposed in the new Standardized Television Disclosure Form will penalize OETA and other public broadcasters for meeting their communities' needs.

Unlike commercial broadcasters, essentially all of the programming on our stations is public-service oriented. To now be compelled to document in writing each of the programs broadcast over our 19 stations would cause this Oklahoma state agency to do one of two things: (1) Incur a tremendous cost in new record-keeping and personnel expenses; or (2) cut back on the amount of such programming because the reporting places an undue burden on already strapped resources. We do not believe the Commission intends either of these scenarios.

Although the current self-reporting of these issues is a cost of doing business that has been calculated and absorbed through many annual budgets. At OETA, we estimate the new requirements will necessitate an additional one to two full-time equivalents. Should we eliminate production, engineering or programming staff in order to hire these additional employees?

Additionally, because OETA maintains four full-power and 15 low-power stations, individually reporting each station would entail multiple filings and a tremendous realignment of resources to comply with these new rules. This, coupled with the added broadcasting hours available through digital multi-casting would place extreme burdens on this licensee.

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Federal Communications Commission
Page Two
April 9, 2008

This licensee does not object to moving much of our public file on our website. However, some of the material (maps, charts, etc.) will require special handling in order to make it fully compliant with the accessibility guidelines. Again, this will place a heavy burden on OETA that may have questionable returns for the public.

Thank you for attention to this matter, and we stand ready to supply additional information and answer any questions.

Cordially,

A handwritten signature in blue ink, appearing to read "John McCarroll", with a stylized flourish extending to the right.

John McCarroll
Executive Director